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Attorneys for Defendant
PAVESTONE, LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JORGE LUIS JARAMILLO LOPEZ, an
individual,

Plaintiff,

vs.

PAVESTONE, LLC, a corporation; and DOES
1 through 50, inclusive,

Defendant.

Case No: 2:22-cv-01419-TLN-DB

*[Originally Yolo Superior Court Case No.
CV2022-1135]*

**JOINT STIPULATION AND ORDER TO
AMEND SCHEDULING ORDER RE:
DISCOVERY DEADLINES**

Complaint Filed: July 6, 2022

1 IT IS HEREBY STIPULATED AND AGREED, between the Parties through their counsel of
2 record as follows:

3 WHEREAS, on August 23, 2022, the Court entered an Initial Pretrial Scheduling Order (Dkt. 8)
4 which provided, in relevant part, "All discovery, with the exception of expert discovery, shall be
5 completed no later than two hundred forty (240) days from the date upon which the last answer may be
6 filed with the Court pursuant to the Federal Rules of Civil Procedure. In this context, "completed" means
7 that all discovery shall have been conducted so that all depositions have been taken and any disputes
8 relative to discovery shall have been resolved by appropriate order if necessary, and where discovery
9 has been ordered, the order has been obeyed. All motions to compel discovery must be noticed on the
10 magistrate judge's calendar in accordance with the Local Rules.";

11 WHEREAS, the last Answer was filed on August 10, 2022 by Defendant. Therefore, the deadline
12 to complete discovery is currently April 7, 2023;

13 WHEREAS, the Parties begun to exchange written discovery and have identified initial
14 deponents. However, the Parties are still in the process of scheduling those depositions on mutually
15 agreeable dates for both counsel and the deponents;

16 WHEREAS, in addition to discovery, the Parties have been informally discussing settlement and
17 have exchanged numerous settlement offers and counteroffers;

18 WHEREAS, the Parties have determined that it will not be possible to complete discovery by the
19 current April 7, 2023 discovery cutoff deadline and that an extension of the discovery deadline will be
20 beneficial to both Plaintiff and Defendant.

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1 THEREFORE, good cause having been shown, the Parties stipulate and respectfully request that
2 the Court amend its scheduling order and set the discovery deadline, with the exception of expert
3 discovery, to September 1, 2023. The Parties will track the Court's instructions and timeline in the Initial
4 Pretrial Scheduling Order for completing all discovery of expert witnesses and dispositive motions.

5 IT IS SO STIPULATED.

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7 Dated: March 13, 2023

FISHER & PHILLIPS LLP

8
9 By: /s/ Gregory L. Blueford

10 TODD B. SCHERWIN

GREGORY L. BLUEFORD

11 Attorneys for Defendant
12 PAVESTONE, LLC

13
14 Dated: March 13, 2023

KINGSLEY & KINGSLEY, APC

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16 By: /s/ Jessica L. Adlouni [as authorized on 3.13.23]

Liane Katzenstein Ly

17 Jessica L. Adlouni

18 Attorney for Plaintiff
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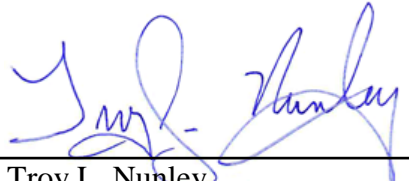
ORDER

Having reviewed the Parties Joint Stipulation and GOOD CAUSE APPEARING THEREFROM, the Court hereby orders as follows:

1. The Parties' Stipulation is **GRANTED**;
2. Discovery deadlines are as follows:
 - (a) Fact Discovery Cut-off: September 1, 2023;
 - (b) Expert Disclosure: October 31, 2023;
 - (c) Supplemental/Rebuttal Expert Disclosure: November 30, 2023;
 - (d) Supplemental Disclosures and Responses: April 1, 2024.
3. Expert Discovery Cut-off: The Parties will follow the Court's instruction in the Initial Pretrial Scheduling Order to complete all discovery of expert witnesses in a timely manner to comply with the Court's deadline for filing dispositive motions.
4. Last Day to File Dispositive Motions: April 29, 2024.

IT IS SO ORDERED.

Dated: March 13, 2023



Troy L. Nunley
United States District Judge